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Attorney for Plaintiff
JOHN BROWN

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JOHN BROWN, an individual,)	Case No.: 2:21-cv-00392-JAM-DMC
Plaintiff,)	
v.)	JOINT STIPULATION AND ORDER TO
)	CONTINUE CASE AND AMEND
)	PRETRIAL SCHEDULING ORDER
TAKEUCHI MFG.CO. (U.S.), LTD, a foreign)	
entity; TAKEUCHI MFG. CO. LTD., a)	Action Filed: March 3, 2021
foreign entity; UNITED RENTALS (NORTH)	
AMERICA), INC., a Delaware Corporation;)	
UNITED RENTALS INC., a Delaware)	
Corporation; AND DOES 1 through 50,)	
INCLUSIVE,)	
Defendants.)	

WHEREAS, pursuant to the Court order, Plaintiff JOHN BROWN filed a First Amended Complaint on October 1, 2021;

WHEREAS, Defendants' filed response on May 19, 2022;

WHEREAS, John Brown, Takeuchi Mfg. Co. (USA), and United Rentals (North America) Inc., (hereinafter the "Parties") filed a joint scheduling report on May 20, 2022, require a filing of initial disclosures on August 19, 2022;

WHEREAS, Takeuchi Manufacturing Co., Limited, was not served with the First Amended Complaint, and is a Japanese Corporation;

WHEREAS, the Parties filed a joint stipulation to extend the deadline to file initial

disclosures to September 23, 2022;

WHEREAS, the Parties have met and conferred regarding the deadlines provided in the joint scheduling report;

WHEREAS, the Plaintiff requested to continue the case and amend the Court's schedule order (ECF #64) due to Attorney's health issues (*See* Exhibit A) and Defendants agreed to the request. The Parties request that the following schedule be implemented:

Discovery Cutoff Date:	09/15/2023
Disclosures of Expert(s) Deadline	07/21/2023
Supplemental Disclosures Deadline:	08/18/2023
Dispositive Motion Filing Deadline:	10/27/2023
Dispositive Motion Hearing:	01/09/2024 at 1:30PM
Joint Mid-Litigation Statement Filing Deadline:	14 days prior to close of discovery
Final Pretrial Conference:	02/23/2024 at 11:00AM
Joint/Bench Trial	04/08/2024 at 9:00AM

Dated: November 10, 2022

ACQUEST LAW

/S/ Nareshwar Singh Virdi

Nareshwar S. Virdi

Acquest Law Inc.

Attorneys for the Plaintiff

John Brown

Dated: November 10, 2022

BOWMAN AND BROOKE LLP

/S/ Neil M. Kliebenstein

Neil M. Kliebenstein

Attorneys for Defendants

Takeuchi Mfg. Co. (USA) Ltd.

1 Dated: November 10, 2022

GORDON & REES LLP

2 /s/ Russel M. Mortyn

3 Russel M. Mortyn

4 Attorneys for Defendants

United Rentals (North America)

5 IT IS SO ORDERED.

6
7 Dated: November 14, 2022

/s/ John A. Mendez

8 THE HONORABLE JOHN A. MENDEZ

9 SENIOR UNITED STATES DISTRICT JUDGE